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2 IN THE UNITED STATES DISTRICT COURT FOR THE
3 NORTHERN DISTRICT OF OKLAHOMA
4 JAMES L. RAYL,)
5 Plaintiff,)
6 vs.) No. 97-CV-505 H(M)
7 METROPOLITAN LIFE)
8 INSURANCE CO., INC.,)
9 Defendant)

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11 VIDEO DEPOSITION OF JAMES L. RAYL,
12 taken on behalf of the defendant, pursuant to
13 notice and agreement as to time and place and the
14 Federal Rules of Civil Procedure, on Wednesday,
15 February 25, 1998, at the law offices of
16 Strecker & Associates, 1600 NationsBank Center,
17 15 W. Sixth Street, Tulsa Oklahoma, before me,
18 Maynard E. Peterson, RPR, RMR, Certified Shorthand
19 Reporter within and for the State of Oklahoma.
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3 Appearances:
4 For the Plaintiff:
5 J. BRIAN RAYL, Esquire
6 Parker, Staggs & Associates, P.C.
7 Southern Ridge
8 6506 South Lewis, Suite 220
9 Tulsa, OK 74136
10
11 For the Defendant:
12 J. STEPHEN POOR, Esquire
13 Seyfarth, Shaw, Fairweather & Geraldson
14 55 East Monroe Street
15 Chicago, ILL 60603
16 and
17 KEVIN S. FINNEGAN
18 Assistant General Counsel
19 MetLife
20 One Madison Avenue
21 New York, NY 10010-3690
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13 and perhaps some administrative
14 assistants/secretaries type, clerical types?
15 A. Yes.
16 Q. Okay. What was the basic function of the
17 call center at that point in time? What did the
18 CSRs do?
19 A. They answered all types of questions from
20 individual life insurance policyholders relating to
21 their policies, service they wanted provided, that
22 sort of thing. And we sent out appropriate forms
23 which -- when there was a transaction, they wanted
24 to do.

25 Q. Okay. This was an inbound call center?
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1 A. Yes.
2 Q. Were there particular product lines that
3 you were responsible for? Or was it a territory
4 or --

5 A. It started out geographically, very slow.
6 It took it several years before it became
7 nationwide, or we ended up taking half of the
8 country.

9 Q. All right. I am focusing on when you took
10 it over in 1986?

11 A. Okay. It was limited to this territory.

12 Q. Okay. But for all MetLife product lines?

13 A. No, only individual life insurance.

14 Q. Okay. So it started out for ILI for the

15 Tulsa --

16 A. Yes.

17 Q. -- territory?

18 A. Yes.

19 Q. Region, whatever it was called at the
20 time. Okay. Were there other call centers
21 elsewhere in the country, either for other product
22 lines or other territories?

23 A. By 1986, I'm not sure. There may have
24 been some that were evolving in the group side.

25 There were no others within personal insurance or
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1 Individual life insurance.

2 Q. So at this point in time, the call center
3 was a service provided predominantly to
4 policyholders, customers of the Tulsa Region?

5 A. Yes.

6 Q. I would like to talk a little bit about
7 the evolution of the call center and the functions
8 of it, because I know it grew over this ten years,
9 this '86 to '96 period.

10 As of '86, when you ceased having
11 responsibilities for the call center, approximately
12 how many people worked in the call center?

13 A. Over 200.

14 Q. And what were the customer service
15 representatives, supervisors, clerical staff?

16 A. Telecommunications, training, staff
17 support, resource.

18 Q. Okay. What services were being provided
19 to policyholders by the Tulsa office.

20 A. Okay.

21 Q. I am now focused in 1996.

22 A. Okay.

23 Q. Then we will talk about how it got from
24 one spot to the other.

25 A. In 1996, the individual business call
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